

National Park Service
US Department of the Interior

National Park Service Commercial Services Program
Denver, Colorado



Developing an Environmental Management Program (EMP)

[Insert Photo]



[Service Type]

For more information, contact the *GreenLine* Number at 303.987.6920 or email NPS_GreenLine@nps.gov.

Updated: [April 2013](#)

Why You Should Read This Document

The National Park Service Commercial Services Program has prepared this document, to assist [Service Type] concessioners in developing a written Environmental Management Program (EMP). All NPS concessioners awarded Category I or II concession contracts that are based on the Standard Concession Contract provisions published in the Federal Register on May 4, 2000 (65 FR 26051-26086: Part III, Department of the Interior, National Park Service, Standard Concession Contract; Revision; Notice), are required under Section 6 of the Standard Concession Contract to prepare and submit a written EMP within 60 days of the date of their concession contract. The concessioner is required to implement the park-approved EMP at concessioner facilities and services in the park. This EMP is equivalent to an Environmental Management System (EMS).

This document provides guidance to assist concessioner's to develop their EMP, outlining the general requirements to meet the nine EMP elements specified in the Concession Contract. The document provides information on the purpose of each EMP element and what is required or a best management practice that may be appropriate for the element. Sample starter language for each element is also provided.

While the guidance provides a format for developing the EMP which has been found to be simple and effective, use of this format is not dictated as long as the Contract-specified elements are adequately addressed. Concessioners may develop and implement an EMS in accordance with ISO 14001.

Limitations and Disclaimer

This document is for guidance purposes only. Its use does not guarantee compliance with Applicable Laws or contract requirements or acceptance of the concessioner's EMP by the Park.

It is critical to understand that a concessioner's EMP will be unique. Each concessioner is responsible for developing its own EMP as appropriate to address their specific facilities and operations, regulatory and contract requirements, company policies and goals.

Per Standard Concession Contract requirements, the concessioner must submit its initial written EMP to the park within 60 days of the effective date of their concession contract for acceptance. The EMP should be updated as necessary and must be annually resubmitted to the park so that it may be reviewed and accepted as current and applicable to concessioner facilities and services.

Definitions and Acronyms Used

Applicable Laws: The laws of Congress governing the area, including, but not limited to, the rules, regulations, requirements and policies promulgated under those laws (e.g., 36 CFR Part 51), whether now in force, or amended, enacted or promulgated in the future, including, without limitation, Federal, state and local laws, rules, regulations, requirements and policies governing nondiscrimination, protection of the environment and protection of public health and safety.

Area: Property within the boundaries of [Name of Park].

Best Management Practices (BMPs): Policies and practices that apply the most current and advanced means and technologies available to the concessioner to undertake and maintain a superior level of environmental performance reasonable in light of the circumstances of the operations conducted under this CONTRACT. BMPs are expected to change from time to time as technology evolves with a goal of sustainability of the concessioner's operations. Sustainability of operations refers to operations that have a restorative or net positive impact on the environment.

Concession Contract: A binding written agreement between the NPS Director and a concessioner entered into under 36 CFR 51. It authorizes concessioners to provide certain visitor services within a park under specified terms and conditions.

Emergency Action Plan (EAP): Covers designated actions employers and employees must take to ensure employee safety from fire and other emergencies. These “other emergencies” include hazardous substance spills or releases, especially if the park directs the concessioner not to clean up large (non-incident) hazardous substance spills or releases. Most concessioners probably have an EAP for other potential emergency situations (fires, floods); however, they may need to add a section for hazardous substance spills and releases.

Environmental Management Program (EMP): Program that achieves the Standard Concession Contract Environmental Management Objectives of (1) complying with all applicable laws pertaining to the protection of human health and the environment and (2) incorporating best management practices in a concessioner's operation, construction, maintenance, acquisition, provision of visitor services, and other activities under a concession contract. The EMP should be developed, documented, implemented, and complied fully with by a concessioner to account for all activities with potential environmental impacts conducted by the concessioner or to which the concessioner contributes.

Environmentally Preferable: Products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution,

reuse, operation, maintenance, or disposal of the product or service.

Environmental Purchasing: Purchase of products and services that are environmentally preferable. Also referred to as “green procurement” or “environmentally preferable purchasing.”

Executive Order (EO): The President's declaration which has the force of law, usually based on existing statutory powers, and requiring no action by the Congress or state legislature.

Occupational Safety and Health Administration (OSHA): Federal agency whose mission is to prevent work-related injuries, illnesses, and deaths by ensuring safe and healthful workplaces.

Pollution Prevention: "Source reduction" as defined in the Pollution Prevention Act of 1990 (42 United States Code 13102) and other practices that reduce or eliminate the creation of pollutants through (1) increased efficiency in the use of raw materials, energy, water, or other resources; or (2) protection of natural resources by conservation.

Source Reduction: Any practice which (1) reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and (2) reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants. The term includes equipment or technology modifications, process or procedure modifications,

reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control.

Standard Operating Procedure (SOP): Procedures used to carry out a specific activity or operation. SOPs are usually documented and filed or posted in a readily accessible location for employee review.

Sustainability: Meeting the needs of the present without impairing the ability of future generations to meet their needs.

United States Environmental Protection Agency (EPA): Federal agency responsible for developing and overseeing many environmental regulations at the Federal level.

Waste Reduction: Preventing or decreasing the amount of waste being generated through waste prevention, recycling, or purchasing recycled and environmentally preferable products.

Waste Prevention: Any change in the design, manufacturing, purchase, or use of materials or products (including packaging) to reduce their amount or toxicity before they are discarded. Waste prevention also refers to the reuse of products or materials.

Why a Documented EMP is Important

The NPS requires a written EMP for all Category I and II concession contracts that are based on the Standard Concession Contract provisions (65 FR 26051-26086). All concessioners, large or small, impact the environment in some way, are subject to local, state and Federal environmental regulations and have opportunities to develop and implement a system to help improve environmental performance.

There are three primary reasons for preparing a single consolidated environmental document (i.e., the EMP):

1. The exercise of preparing the written EMP helps familiarize you with environmental regulations and policies applicable to your facilities and services. Chances are that you already know about many of these regulations and policies. However, a comprehensive review of your operations may help you identify new or additional regulations that are applicable to the types of facilities you operate and services you provide under your concession contract.

2. The written EMP helps you proactively plan for compliance with existing environmental regulations and policies. It may also help you identify opportunities for implementing best management practices (BMPs). In developing an EMP, you will look at the types of services you provide at the facilities you operate and identify how these activities affect or impact the environment. Through this exercise, you may identify activities and practices with environmental impacts and opportunities for improvement that you had not considered before.

3. Your EMP can serve as a pointer document that identifies where environmental documents (such as reports and procedures) are located and identifies who is responsible for maintaining these documents. With a written EMP, you are able to systematically organize and locate copies of all your environmental records, reports, and documents, even if an environmental manager is absent or leaves the organization. A consolidated document will also assist the NPS in reviewing and evaluating your environmental program and practices to ensure compliance with applicable laws. In the event that a regulatory agency visits your operations, your EMP information and documents are readily available for review, which will help to show that your organization is committed to environmental compliance and environmental management.

A Quick Guide to the EMP

Table 1 presents the nine required EMP elements (A-I) as specified in Section 6 of the Standard Concession Contract. These are further described in the Appendix.

Table 1: EMP Elements

A	Policy
B	Goals and Targets
C	Responsibility and Accountability
D	Documentation
E	Document Control and Information Management
F	Reporting
G	Communication
H	Training
I	Monitoring, Measurement, and Corrective Action

The sample written EMP presented in the Appendix divides each of the nine EMP elements into required components (per the Standard Concession Contract) and BMP opportunities.

Required components are marked with a checkmark (✓). Undertaking BMP opportunities is encouraged to support the EMP element but is not required. The number of BMP opportunities that exist is unlimited; therefore, not all of them are included in this document. Your environmental audit provides a good reference for BMP opportunities. BMP opportunities are marked with a star (★). Most ★s are consistent with current management practices adopted by private industry sectors.

Table 2: Symbols

✓	Required component (per Section 6 of the Standard Concession Contract)
★	BMP Opportunity

The description for each EMP element included in the Appendix provides further detail and explanation for each element as required in the Standard Concession Contract. As a reference, there is a footnote in the Appendix for each EMP element that cites the language included in the Standard Concession Contract.

Additional Assistance Resources

The sample EMP provided in the Appendix is a template. In developing your EMP, consider contacting your local, state, and Federal environmental agencies for assistance in identifying applicable laws for your concessioner facilities, services, and operations. In addition, consider reviewing the resources listed below to identify appropriate BMPs for your EMP. Some of these resources are available through the NPS GreenLine number (303-987-6920) or at the link below.

- Practical Guide to Environmental Management for Small Business: www.smallbiz-enviroweb.org/html/pdf/EM_Guide0902.pdf
- *GreenLine* Newsletter: http://concessions.nps.gov/tools_greenline.htm
- NPS Commercial Services Program Website: www.concessions.nps.gov

Appendix: Environmental Management Program Template

A written EMP is composed of nine required elements as stated in Section 6 of the Standard Concession Contract. A description of these nine elements (identified as letters A through I) is provided on the left side of the following pages.

A template for an EMP, including these nine elements, is presented on the right side of the following pages as an example. The template is a guide to help jumpstart your efforts in developing an EMP for your facilities and services. **Remember that the EMP that you develop should be specific to, and adequately address, the type and size of services you provide under your concession contract with the NPS.** Your EMP can and should be simple and flexible to ensure it is fully embraced and implemented by you and your staff. However, more complex operations and services, or additional park requirements to protect specific resources, may warrant a more detailed document.

[Concession Name] – Written EMP

[Park Name]

Date: [Date]

Sample EMP

EMP Element: A. Policy	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]
<p>The environmental policy declares your commitment to protecting and conserving the environment. The policy serves as the foundation for your EMP and provides a unifying vision to guide development and implementation of your environmental program.</p> <p><u>Required Components:</u></p> <ul style="list-style-type: none"> ✓ Develop and document your policy. ✓ State your commitment to complying with applicable laws. ✓ State your commitment to implementing best management practices (BMPs). ✓ State your commitment to continual improvement (e.g., commit to reviewing your environmental program and updating or modifying it as appropriate). <p><u>BMP Opportunities:</u></p> <ul style="list-style-type: none"> ✦ State your commitment to dedicate resources (i.e., staff and budget) to implement your EMP. ✦ State your commitment to identify and hold staff responsible for potential environmental impacts. ✦ State your commitment to communicate your environmental program to employees, customers and the NPS. ✦ State your commitment to provide educational outreach to visitors and other stakeholders about environmental issues and educate them to reduce their own impact upon the environment. ✦ State your commitment to recognize your employees' exceptional environmental performance (e.g., through awards, bonuses). 	<p><u>A. Policy</u></p> <p>[Insert Concessioner's Environmental Policy]</p> <p>This environmental policy is available to all employees and Park staff. We welcome suggestions for improving the EMP to ensure that it responds to the needs of our employees, visitors, and the environment in which we operate.</p> <p>[First & Last Name] [Title] [Concession Name]</p> <p style="text-align: center; font-size: 2em; opacity: 0.5; transform: rotate(-10deg);">Sample EMP</p>

Standard Concession Contract Language, Sec. 6 (b)(3)(i), Policy: *"The EMP shall provide a clear statement of the Concessioner's commitment to the Environmental Management Objectives."*

EMP Element: B. Goals and Targets	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]												
<p>It is important to establish goals and targets to measure your progress in implementing the EMP and to support your environmental policy. It also helps you continuously improve your EMP. Goals and targets are interrelated. Goals should provide broad ideas on what you want to accomplish and should be consistent with your environmental policy. They should help you answer the question, “will achieving this goal be consistent with our policy?” Targets identify specific actions or steps to be taken toward achieving goals. They should incorporate deadlines and be measurable.</p> <p><u>Required Components:</u></p> <ul style="list-style-type: none"> ✓ Set goals that are consistent with your environmental policy. ✓ Set annual (i.e. short-term) targets. ✓ Set long-term targets. ✓ Set goals and targets that address known deficiencies in complying with applicable laws, including issues identified during self-assessments or through environmental audits (such as the Concession Environmental Audit System). <p><u>BMP Opportunity:</u></p> <ul style="list-style-type: none"> ★ Identify goals and targets for implementing BMPs. <p><u>Notes:</u> Establishing targets is an ongoing process. You may need to review the targets on a more frequent basis to determine if they are still appropriate or whether they need to be modified or updated. As targets are achieved, you should consider establishing new targets to continue to support existing goals or in support of new goals.</p> <p>Goals and targets can be established to maintain current levels of performance as well to improve performance. If your goal is to maintain current levels, you should address current practices to be maintained.</p> <p>Goals and targets should address compliance and may include BMPs.</p>	<p><u>B. Goals and Targets</u></p> <p>Annually, [Concession Name] will review our facilities and services relative to applicable regulations, to Park environmental requirements and to the [Service type's industry] best management practices. We will seek opportunities to improve our operations to demonstrate a commitment to environmental compliance and stewardship. To achieve this, we will identify and set realistic goals and targets that will improve our client satisfaction while minimizing our environmental impacts to help ensure the protection, conservation, and preservation of Park resources.</p> <p>Note: It may be helpful to review your environmental audit report as a resource for identifying goals and setting targets.</p> <p><u>Table 1: Goals and Targets</u></p> <table border="1"> <thead> <tr> <th>Goal</th><th>Target</th></tr> </thead> <tbody> <tr> <td>Maintain environmental compliance</td><td>Address findings in environmental audit report.</td></tr> <tr> <td>Reduce use of hazardous chemicals and materials to minimize potential spills and enhance worker safety.</td><td>Discontinue use of all toxic fly spray by July 2007. Replace with nontoxic products (e.g., Skin So Soft for horses).</td></tr> <tr> <td>[Goal]</td><td>[Description and Target Completion Date]</td></tr> <tr> <td>[Goal]</td><td>[Description and Target Completion Date]</td></tr> <tr> <td>[Goal]</td><td>[Description and Target Completion Date]</td></tr> </tbody> </table> <p><i>This table provides one example of a goal and target. For your EMP you should fill in the table as appropriate.</i></p>	Goal	Target	Maintain environmental compliance	Address findings in environmental audit report.	Reduce use of hazardous chemicals and materials to minimize potential spills and enhance worker safety.	Discontinue use of all toxic fly spray by July 2007 . Replace with nontoxic products (e.g., Skin So Soft for horses).	[Goal]	[Description and Target Completion Date]	[Goal]	[Description and Target Completion Date]	[Goal]	[Description and Target Completion Date]
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[Goal]	[Description and Target Completion Date]												
[Goal]	[Description and Target Completion Date]												
[Goal]	[Description and Target Completion Date]												

Standard Concession Contract Language, Sec. 6 (b)(3)(ii), Goals and Targets: “The EMP shall identify environmental goals established by the Concessioner consistent with all Environmental Management Objectives. The EMP shall also identify specific targets (i.e., measurable results and schedules) to achieve these goals.”

EMP Element: C. Responsibility and Accountability	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]						
<p>For an EMP to be effective, it is important to have clearly defined environmental roles and responsibilities for all staff. Involvement and commitment by all employees is essential to a successful environmental program.</p> <p><u>Required Components:</u></p> <ul style="list-style-type: none"> ✓ Designate an environmental program manager. (It is appropriate to assign this title and accompanying duties to an existing worker with knowledge of environmental issues if staffing is limited.) ✓ Assign environmental responsibilities and functions to appropriate staff to ensure they are aware of their environmental roles and responsibilities. <p><u>BMP Opportunities:</u></p> <ul style="list-style-type: none"> ✱ Develop and implement evaluation procedures to assess environmental performance of staff. <p><u>Notes:</u> You should try to include roles and responsibilities in your employees' job descriptions to help convey the idea that it is everyone's responsibility to implement the EMP.</p> <p>The environmental responsibilities listed here are quite detailed but may not cover all specific staff where duties should be described. Your environmental responsibilities may be less detailed, but still cover the same operations and activities. Another option, although not as effective, is to develop a general requirement that states that all staff will be involved in the development and implementation of an EMP and that employees are responsible for ensuring the EMP is effective and successful.</p>	<p><u>C. Responsibility and Accountability</u></p> <p><u>Table 1: Positions and Responsibilities</u></p> <table border="1"> <thead> <tr> <th data-bbox="596 444 982 485">Position</th> <th data-bbox="989 444 2013 485">Environmental Responsibilities</th> </tr> </thead> <tbody> <tr> <td data-bbox="596 490 982 902"> <p>Environmental Program Manager</p> <p>[First & Last Name]</p> <p>[Contact Information]</p> </td> <td data-bbox="989 490 2013 902"> <ul style="list-style-type: none"> • Develops, maintains, and communicates EMP manual and environmental policy. • Coordinates development of environmental goals and targets. Reviews goals and targets at least annually to identify opportunities to modify or update them. • Maintains all environmental documentation and records. • Ensures employees receive environmental training and maintains employee training records. • Participates in NPS Concession Environmental Audit System. • Monitors and ensures that all environmental audit findings are addressed and closed. </td> </tr> <tr> <td data-bbox="596 907 982 1097"> <p>[Position]</p> <p>[First & Last Name]</p> <p>[Contact Information]</p> </td> <td data-bbox="989 907 2013 1097"> <ul style="list-style-type: none"> • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] </td> </tr> </tbody> </table> <p><i>This table provides one example of an employee 's position and his/her respective responsibilities. For your EMP you should fill in the table as appropriate.</i></p>	Position	Environmental Responsibilities	<p>Environmental Program Manager</p> <p>[First & Last Name]</p> <p>[Contact Information]</p>	<ul style="list-style-type: none"> • Develops, maintains, and communicates EMP manual and environmental policy. • Coordinates development of environmental goals and targets. Reviews goals and targets at least annually to identify opportunities to modify or update them. • Maintains all environmental documentation and records. • Ensures employees receive environmental training and maintains employee training records. • Participates in NPS Concession Environmental Audit System. • Monitors and ensures that all environmental audit findings are addressed and closed. 	<p>[Position]</p> <p>[First & Last Name]</p> <p>[Contact Information]</p>	<ul style="list-style-type: none"> • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities]
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<p>Environmental Program Manager</p> <p>[First & Last Name]</p> <p>[Contact Information]</p>	<ul style="list-style-type: none"> • Develops, maintains, and communicates EMP manual and environmental policy. • Coordinates development of environmental goals and targets. Reviews goals and targets at least annually to identify opportunities to modify or update them. • Maintains all environmental documentation and records. • Ensures employees receive environmental training and maintains employee training records. • Participates in NPS Concession Environmental Audit System. • Monitors and ensures that all environmental audit findings are addressed and closed. 						
<p>[Position]</p> <p>[First & Last Name]</p> <p>[Contact Information]</p>	<ul style="list-style-type: none"> • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] • [List All Other Environmental Responsibilities] 						

Appendix – Sample Written EMP – [Service Type]

Standard Concession Contract Language, Sec. 6 (b)(3)(iii), Responsibilities and Accountability: *“The EMP shall identify environmental responsibilities for concessioner employees and contractors. The EMP shall include the designation of an environmental program manager. The EMP shall include procedures for the concessioner to implement the evaluation of employee and contractor performance against these environmental responsibilities.”*

EMP Element: D. Documentation	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]
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To ensure that your EMP is understood and operating as designed, you must provide adequate information to your staff. You should document what you (or your staff) do and how it is done for key activities that deal with environmental issues. A good starting point is to consider what you would tell a new employee about your environmental program; use this to develop a document that clearly states this information.

Required Components:

- ✓ Develop and maintain a written EMP that includes all nine required EMP elements as identified in the concession contract.
- ✓ Identify and maintain all plans and standard operating procedures (SOPs) required by applicable laws, including the concession contract.
- ✓ Identify and maintain all records required by applicable laws, including the concession contract.

BMP Opportunities:

- ✱ Identify and maintain all plans and SOPs not required by applicable laws or the concession contract.
- ✱ Identify and maintain additional environmental records that support or advance the environmental program as appropriate.

Notes:

Your EMP does not have to describe every detail of your environmental program. Instead, the EMP can provide references to other documents or procedures. For example, rather than including the inventory of hazardous wastes, you could simply state that the Office Manager maintains the inventory and that the file copy is located in the office.

You may wonder why you need to develop an SOP when a procedure is already described in your operating and maintenance (O&M) plans. The SOPs identified in O&M Plans often simply identify responsibilities (e.g., concessioner shall manage solid waste), but do not provide detail on how to carry out these responsibilities.

D. Documentation

Listed below are all the environmental documents that we will maintain. Annually, the Environmental Program Manager will determine whether there are additional environmental documents required by applicable laws, the concession contract and operating and maintenance plans, or those needed to support the environmental program, that should be added to this list. The location and people responsible for maintaining these documents are identified under Element E of this EMP.

a. Written EMP.

b. Environmental Plans.

- Operating Manual (includes [Concession Name] -specific operating procedures)

c. Environmental SOPs.

- [List SOPs]
- [List SOPs]

d. Environmental Records. Procedures and responsibilities for updating these environmental records are found in our [Location].

- Inventory of hazardous substances
- Material safety data sheets (MSDSs) for all hazardous chemicals
- Inventory of solid waste
- Environmental Audit Report
- Environmental Audit Corrective Action Report
- Notices of Violation (NOVs)
- Operational evaluation
- Approval for pesticide use
- Annual EMP Performance Summary

Standard Concession Contract Language, Sec. 6 (b)(3)(iv), Documentation: *“The EMP shall identify plans, procedures, manuals, and other documentation maintained by the Concessioner to meet the Environmental Management Objectives.”*

EMP Element: E. Documentation, Control, and Information Management System	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]																																			
<p>A documentation control and information management system provides a way for you to track and monitor all of your plans, SOPs, records, and other documents identified under the Documentation component of your EMP (Element D). Items that should be addressed in this element include identifying where plans, SOPs, records, and other documents can be located, how they are reviewed, and who is responsible for reviewing and maintaining these documents.</p> <p><u>Required Component:</u></p> <p>✓ Develop, document, and implement procedures to manage environmental documents. Indicate where the documents are physically located, and who is responsible for managing and/or maintaining the documents.</p> <p><u>BMP Opportunity:</u></p> <p>✱ Develop a training program and train staff on procedures and policies for managing environmental documents.</p> <p><u>Notes:</u> If staff and others who need access to the documents are connected to a computer network or have access to your company's internal website, consider using a paperless document control and information management system. Such systems can facilitate control and revision of documents and ensure that the most current versions of all documents are readily accessible to all employees.</p> <p>The simplest way to keep this document control information may be in a table, such as the one presented here.</p>	<h2 data-bbox="619 250 1667 375">D. Documentation Control and Information Management System</h2> <p data-bbox="619 380 2007 634">The Environmental Program Manager is responsible for identifying all environmental documentation that will be maintained, listing it below, and assigning individuals to update the environmental documentation. S/he will review this list on at least an annual basis to determine whether any documents need to be updated, amended, or added. Individuals responsible for updates will apprise all relevant staff about any changes made to the documents by telling them about changes in person, circulating updated versions of the documents, and posting changes on the bulletin board in the main office.</p> <p data-bbox="619 672 2007 781">Most environmental documents will be kept in the Environmental Program Manager's office, including copies of key records. Certain documents are maintained at the point of use (e.g., inspection logs).</p> <table border="1" data-bbox="619 813 2007 1273"> <thead> <tr> <th>Document</th> <th>Version & Date</th> <th>Location</th> <th>Responsible for Updates</th> </tr> </thead> <tbody> <tr> <td>Written EMP</td> <td>1.0 (3/2011)</td> <td>Environmental Program Manager's Office</td> <td>Environmental Program Manager</td> </tr> <tr> <td>Environmental Plans</td> <td></td> <td></td> <td></td> </tr> <tr> <td>[List Environmental Plans] [List Environmental Plans]</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Environmental SOPs</td> <td></td> <td></td> <td></td> </tr> <tr> <td>[List SOPs] [List SOPs]</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Environmental Records</td> <td></td> <td></td> <td></td> </tr> <tr> <td>[List Records] [List Records]</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Document	Version & Date	Location	Responsible for Updates	Written EMP	1.0 (3/2011)	Environmental Program Manager's Office	Environmental Program Manager	Environmental Plans				[List Environmental Plans] [List Environmental Plans]				Environmental SOPs				[List SOPs] [List SOPs]				Environmental Records				[List Records] [List Records]			
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Standard Concession Contract Language, Sec. 6 (b)(3)(v), Documentation Control and Information Management System: “The EMP shall describe (and implement) document control and information management systems to maintain knowledge of Applicable Laws and BMPs. In addition, the EMP shall identify how the Concessioner will manage environmental information, including without limitation, plans, permits, certifications, reports, and correspondence.”

EMP Element: F. Reporting	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]														
<p>Certain environmental data must be reported to Federal, state, regional, and/or local environmental agencies, and to the park, on a routine basis. The Reporting element should identify what data and/or reports must be submitted and identify a timeline for when and to whom the information should be submitted.</p> <p><u>Required Components:</u></p> <ul style="list-style-type: none">✓ Identify your required reporting requirements under applicable laws, including the concession contract.✓ Update reporting requirements based on changes made to applicable laws, including the concession contract.✓ Submit all environmental reports to regulatory agencies and the park on time.✓ Ensure your reports are included in the documentation section of your EMP. <p><u>BMP Opportunities:</u></p> <ul style="list-style-type: none">★ Communicate the results of your internal environmental audits/evaluations to the park.★ Communicate your performance against your annual goals and targets to the park and/or customers and stakeholders. <p><u>Notes:</u> Listing reports required by applicable laws, including the concession contract, along with the date by which they need to be submitted/updated, will help you keep track of all your reporting requirements and ensure you do not miss a deadline. All of these reports should also be included in your documentation (Element D) and document control and information management system (Element E) sections of your EMP.</p>	<h2>F. Reporting</h2> <p>The Environmental Program Manager will conduct an annual review to determine whether there are new environmental requirements and/or reports required under the applicable laws that govern activities of [Concession Name] or that are required by the concession contract and operating and maintenance plans. The Environmental Program Manager will ensure that all reporting is completed and submitted in a timely manner and consistent with regulatory timelines.</p> <p><u>Table 1: Report Timelines and Responsibilities</u></p> <table><tr><th>Report</th><th>For</th><th>Date Due</th><th>Responsibility</th><th>Submitted To/Date</th></tr><tr><td>Environmental Audit Corrective Action Report</td><td>Park</td><td>As corrective actions are completed</td><td>Environmental Program Manager</td><td>Park Concession Specialist<ul style="list-style-type: none">• 08/2001• 11/2002• 05/2003</td></tr></table>					Report	For	Date Due	Responsibility	Submitted To/Date	Environmental Audit Corrective Action Report	Park	As corrective actions are completed	Environmental Program Manager	Park Concession Specialist <ul style="list-style-type: none">• 08/2001• 11/2002• 05/2003
Report	For	Date Due	Responsibility	Submitted To/Date											
Environmental Audit Corrective Action Report	Park	As corrective actions are completed	Environmental Program Manager	Park Concession Specialist <ul style="list-style-type: none">• 08/2001• 11/2002• 05/2003											

Appendix – Sample Written EMP – [Service Type]

					<ul style="list-style-type: none"> 01/2004. Audit closed. No further reporting required at this time.
	[Type of Report]	Park or Internal	<i>[List Dates]</i>	[List Responsible Party]	[Insert Dates]
<i>This table provides one example of a report timeline and responsibilities. For your EMP you should fill in the table as appropriate.</i>					

Standard Concession Contract Language, Sec. 6 (b)(3)(vi), Reporting: “The EMP shall describe (and implement) a system for reporting environmental information on a routine and emergency basis, including providing reports to the Director under this CONTRACT.”

EMP Element: G. Communication	SAMPLE FOR THIS EMP ELEMENT: <i>[Concession Name]</i> – Written EMP – <i>[Date]</i>
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Effective environmental management requires effective communication. Internally, you should communicate your EMP to help motivate your staff, gain acceptance for your plans and efforts, ensure understanding of roles and responsibilities, and monitor and evaluate performance. You should also communicate your EMP to external parties such as customers, the NPS, and other stakeholders. Under this element, you identify your different audiences, how and what you will communicate to them, and who is responsible for communicating to the audiences.

Required Components:

- ✓ Establish procedures to ensure that all environmental information is communicated as required by applicable laws and the concession contract (e.g., MSDSs for staff).
- ✓ Document your environmental communication strategies and procedures. These should describe who is responsible for communicating environmental information to different audiences (e.g., visitors, staff).
- ✓ Communicate the EMP to staff for their review and as new ideas are introduced.

BMP Opportunities:

- ✦ Discuss environmental performance at staff meetings; add it as a standing agenda item.
- ✦ Have staff participate in park environmental meetings as appropriate.
- ✦ Establish an environmental committee (“green team”) as a means to communicate with staff and receive staff input on EMP issues.
- ✦ Establish procedures to solicit and respond to input from external groups such as visitors, local communities, and the NPS.
- ✦ Communicate and partner with the park on environmental projects where feasible and appropriate (e.g., manure composting).
- ✦ Participate in organizations that provide environmental support, information, or resources.

Notes:

Much of your communication may take place via informal meetings or bulletin board postings.

G. Communication

[\[Concession Name\]](#) will communicate with our staff, the Park, and our guests/visitors to apprise and educate our different audiences about our environmental management program, our environmental initiatives, our goals and achievements, and our commitment to protect the environment.

Table 1: Communications and Responsibilities

Audience	Communication	Content	Responsibility
Park	<ul style="list-style-type: none"> Annual reports Informal communication with Park Concession Specialist 	<ul style="list-style-type: none"> Annual reporting (as listed in section F of this EMP) Updates on Park policies, regulations 	Environmental Program Manager
Regulators	<ul style="list-style-type: none"> Onsite formal inspections (i.e., face-to-face) Phone conversations Formal letter/memo correspondence 	<ul style="list-style-type: none"> Compliance documents and/or reports (as requested) 	Environmental Program Manager
[Insert Audience]	[Communication Type]	[Content]	[Responsible Party]

Appendix – Sample Written EMP – [Service Type]

This table provides two examples of communications and responsibilities. For your EMP you should fill in the table as appropriate.

Standard Concession Contract Language, Sec. 6 (b)(3)(vii), Communication: *“The EMP shall describe how the environmental policy, goals, targets, responsibilities and procedures will be communicated throughout the Concessioner's organization.”*

**EMP Element:
H. Training**

SAMPLE FOR THIS EMP ELEMENT:
[Concession Name] – Written EMP – [Date]

Environmental training ensures that all staff are aware of the company's commitment to protecting, conserving, and preserving park resources, and procedures to follow while performing job duties. Your training program should address the requirements of applicable laws, educate employees about your EMP, and inform them of environmental impacts associated with their specific jobs. You may, in fact, already be conducting some environmental training and may simply need to modify your current training program to address EMP elements.

Required Components:

- ✓ Ensure all staff receive adequate job-specific training as required by applicable laws, including the concession contract.
- ✓ Assess training needs periodically. Document the training format (e.g., videotape, trainer) and frequency of training (e.g., at the start of every season, once a month during the season).
- ✓ Maintain training records for employees.
- ✓ Develop and implement a training plan (e.g., who needs training, type of training, how often it is required).

BMP Opportunities:

- ★ Coordinate training with the park, where feasible (e.g., partner with the park on training, invite park staff to concessioner training).
- ★ Conduct EMP training for all employees upon hiring, and whenever the EMP changes.

Notes:

There are few regulatory-mandated training requirements for small concessioners. However, if you deal with any hazardous chemicals (e.g., most cleaning chemicals), you usually need to comply with the OSHA Hazard Communication Standard. Also, if hazardous substances (e.g., cleaning chemicals) can spill, you most likely also need to talk with the park to determine your responsibilities if a spill occurs and train staff on these procedures (e.g., clean it up, call park).

Note that some types of training, but not all, can be informal (e.g., lunchtime discussion). Consider developing an EMP training package for new employees and provide it as part of their orientation.

H. Training

The Environmental Program Manager will periodically identify and review training requirements for all employees and ensure that employees receive required training. Employees will be formally trained about environmental issues related to applicable laws within two weeks of hiring; all training related to environmental issues will be completed within one month of hiring. The Environmental Program Manager will maintain records documenting dates and types of training taken by each employee.

Training will occur as identified in Table 1. The form used to record each employee's training record will be similar to Table 2.

Table 1: Training

Training Topic	Type	Trainer	Employees Covered	Frequency
EMP Awareness	In-House	Env Prog Mgr	All	Initial Hire/Annual Refresher
[Topic]	[Type]	[Position]	[Who's Trained]	[Frequency]

Table 2: Training Records

Employee Name _____			
Training Topic	Trainer	Date	Date of Next Required Training
HAZCOM	[Name]	[Date]	[Date]
[Topic Name]	[Name]	[Date]	[Date]
Others (list):	[Name]	[Date]	[Date]

Appendix – Sample Written EMP – [Service Type]

These tables provide examples of a training and employee training recordings. For your EMP you should fill in the table as appropriate.

Standard Concession Contract Language, Sec. 6 (b)(3)(viii), Training: *“The EMP shall describe the environmental training program for the Concessioner, including identification of staff to be trained, training subjects, frequency of training and how training will be documented.”*

EMP Element: I. Monitoring, Measurement, and Corrective Action	SAMPLE FOR THIS EMP ELEMENT: [Concession Name] – Written EMP – [Date]
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Appendix – Sample Written EMP – [Service Type]

By implementing monitoring, measurement, and corrective action procedures, you can measure the performance of your operations against regulatory (i.e., compliance) and BMP standards. You can also evaluate how effective and successful your EMP is and determine whether you have reached your goals and targets (Element B) or whether there is an opportunity to revise and improve the EMP.

Required Components:

- ✓ Participate in the NPS environmental audit.
- ✓ Correct NPS environmental audit findings according to the assigned schedule.
- ✓ Review the EMP at least annually, and modify appropriate elements (e.g., goals and targets) based upon quantitative data and feedback from staff, the park, and visitors.

BMP Opportunities:

- ✱ Conduct periodic internal environmental assessments of concession facilities and services.
- ✱ Collect information to measure progress toward your environmental goals and targets.

Notes:

It is important to participate in the NPS environmental audit. However, it is also very useful to establish your own routine internal environmental self-assessment program to proactively improve environmental management of your facilities and services.

Quantitative data (e.g., number of people that received environmental messaging, number of pounds of plastic recycled) is often a more useful way to measure performance since it allows you to provide specific details about performance.

I. Monitoring, Measurement, and Corrective Action

At the end of each calendar year, the Environmental Program Manager will determine whether [Concession Name] has achieved environmental goals and targets (as listed under Element B of this written EMP). If no progress has been made, the Environmental Program Manager will coordinate with staff to determine why goals and targets were not achieved and will implement new operating policies or procedures that will assist [Concession Name] in achieving our stated environmental goals and targets. We will prepare an annual EMP Performance Summary to document our progress and maintain the summary on file in the Environmental Program Manager's office.

Goal	Target	Completion Date/Status	Other Comments
Reduce use of hazardous chemicals and materials to minimize potential spills and enhance worker safety.	Discontinue use of all toxic fly spray by 2009. Replace with nontoxic products (e.g., Skin So Soft for horses).	Complete: 2/2008	[Insert Additional Comments]
[Goal]	[Description and Target Completion Date]	[Complete] [Not Complete] [In Progress]	[Insert Additional Comments]
[Goal]	[Description and Target Completion Date]	[Complete] [Not Complete] [In Progress]	[Insert Additional Comments]

The Environmental Program Manager will also routinely monitor progress in addressing audit findings identified during environmental audits, including audits we conduct internally as well as environmental audits conducted by the NPS and environmental agencies. The Environmental Program Manager will ensure that [Concession Name] adequately addresses identified audit findings in a timely manner (i.e., before the Deadline to Close Audit Finding date agreed upon by the audit team and [Concession Name] for NPS environmental audits). [Concession Name] plans for implementing corrective action will be filed, along with the environmental audit report, in the Environmental Program Manager's office.

At least annually, the Environmental Program Manager and appropriate staff will review this written EMP and identify opportunities for improvement. As appropriate, we will discuss all updates with our employees and provide additional training if appropriate. We will continuously solicit input and feedback from our employees on the EMP. We will share a copy of the original EMP and all subsequent updates with the Park Concession Specialist [Park Concession Specialist Name].

Standard Concession Contract Language, Sec. 6 (b)(3)(ix), Monitoring, Measurement, and Corrective Action: *"The EMP shall describe how the Concessioner will comply with the EMP and how the Concessioner will self-assess its performance under the EMP, at least annually, in a manner consistent with NPS protocol regarding audit of NPS operations. The self-assessment should ensure the Concessioner's conformance with the Environmental Management Objectives and measure performance against environmental goals and targets. The EMP shall also describe procedures to be taken by the Concessioner to correct any deficiencies identified by the self-assessment."*